

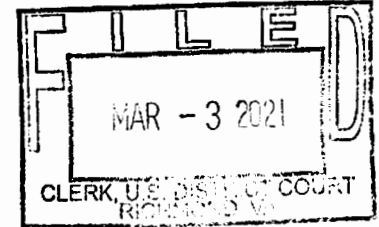
Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division



Case No.

3:21cv139

(to be filled in by the Clerk's Office)

Courtney Lamont Edmond

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one)



Yes

☐ No"See Attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Courtney Lamont Edmond

Street Address

1105 Dominion Townes Pl

City and County

Richmond

State and Zip Code

Virginia 23223

Telephone Number

804-687-2350

E-mail Address

c.edmond41@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name Wells Fargo NA

Job or Title (if known)

Street Address 420 Montgomery StreetCity and County San FranciscoState and Zip Code California 94104

Telephone Number

E-mail Address (if known)

Defendant No. 2

Name Amanda LongJob or Title (if known) InvestigatorStreet Address 3480 Stateview Blvd Floor 1City and County Fort MillState and Zip Code South Carolina 29715Telephone Number 704-427-8478E-mail Address (if known) amanda.h.long@wellsfargo.com

Defendant No. 3

Name Dennis CapriglioneJob or Title (if known) Senior CounselStreet Address One North Jefferson AveCity and County St LouisState and Zip Code Missouri 63103Telephone Number 314-955-3000E-mail Address (if known) dennis.capriglione@wellsfargoadvisors.com

Defendant No. 4

Name Ruth Vitale

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII of the Civil Rights Act of 1964 as codified 42 U.S.C. 2000e to 2000e-17
(race, color, gender, religion, national origin)
Anti-retaliation provision

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the
State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

"See Attached"

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks general damages in excess of \$250,000, according to proof, consisting of lost wages, benefits, pain and suffering due to emotional distress. Plaintiff further seeks punitive damages totaling three times his lost wages and pain and suffering, on a minimum of \$750,000.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 3, 2021

Signature of Plaintiff

Printed Name of Plaintiff

Courtney L. Edmond
Courtney L. Edmond

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Defendants

Wells Fargo NA, Amanda Long, Dennis Capriglione, Ruth Vitale

III. Statement of Claim

Plaintiff was a long-term employee of Defendant Wells Fargo, for more than 10 years, as well as a long-term customer, for more than two decades.

Plaintiff was retaliated against and wrongfully terminated for whistle blowing potential FINRA violations along with ongoing discriminatory hiring and promotion practices within the Mutual Funds Department that were previously reported to human resources by other employees.

Without justification, Defendant conducted two internal investigations, ostensibly into the source of certain funds. These investigations led to two (2) conference calls, on April 17, 2020 and April 24, 2020, respectively. Participants on the call included Plaintiff and defendants Amanda Long, Dennis Capriglione, and Ruth Vitale.

During the first call, Plaintiff informed the Defendants of ongoing discriminatory practices within the Mutual Funds department along with potential FINRA violations that could have negative implications for hundreds or even thousands of customers. Defendant Capriglione seemed to take umbrage at this revelation and became hostile to Plaintiff. The other individual Defendants participated to varying degrees in being dismissive of Plaintiff's information.

Defendant Bank's investigation was uncalled for because Plaintiff's funds were always properly sourced. Further, Defendant did not, and continues not, to have any evidence of wrongdoing by Plaintiff. At all material times prior to Plaintiff's termination, had been a valued employee, having received laudatory performance reviews, and Plaintiff was highly respected by his co-workers.

Plaintiff's claims are further supported by the Virginia Employment Commission, which granted Plaintiff unemployment benefits, specifically citing the weak reason for termination further proving the real reason for termination was retaliation.

Plaintiff's claims are additionally supported with his filing of an Ethics Complaint. In said complaint, certain ethical violations were found to be true, including against Supranee Krause, Department Manager of Mutual Funds.

FINRA was advised and is aware of the potential Financial Industry Violations that were ignored by Defendants.